Chapter 2 Introduction to Petroleum, Oil, and Lubricants

Petroleum, Oil and Lubricants (POL) is a broad term which includes all petroleum and associated products used by the Department of the Navy (DoN).

40 CFR part 112.2 defines oil as any kind or in any form including but not limited to fats, oils or greases of animal, fish or marine mammal origin, vegetable oils, including oils from seeds, nuts, fruits or kernels and other oils and greases including petroleum, fuel oil, sludge, synthetic oils, mineral oils, oil refuse and oil mixed with wastes other than dredge spoil.

POL is normally stored in underground or aboveground storage tanks. All tanks do not store POL. Depending on tank contents, some tank cleanups are done under Installation Restoration cleanup standards and some tanks are cleaned up under state or commonwealth standards.

POL cleanups not related to Restoration are mainly managed by states or commonwealths under Resource Conservation and Recovery Act (RCRA) with minimal or no EPA involvement. As of March 2016, 38 states (plus the District of Columbia and Puerto Rico) have approved UST programs

If the UST/AST cleanup program was created and is managed by a state and does not have any relation, including funding, to the CERCLA cleanup program, the UST/AST documents associated with the site, should not be added to NIRIS. The state run/created UST/AST documents are considered to be part of the Compliance program.

In the mid-1990s, all Navy/USMC POL installation cleanup work was E,RN funded and the UST sites were added to NORM. The cleanup work was not considered part of the Installation Restoration program and documents were not included in the AR.

UST regulations changed in the late 1990s; tank owners were required to have all tanks tested for leaks and have leak detection systems installed for protection of the environment.

Most installations were slow to meet the requirement so NAVFAC set a policy that, "… if your tanks were not tested, leak detection was not installed by a certain date and the tanks were found to be leaking sometime in the future, cleanup was the responsibility of the installation and no longer E,RN eligible…"

The basis for adding site related POL documents to NIRIS is whether the UST/AST site is listed in NORM.

The POL cleanup program follows a CERCLA like process. All POL documents are considered public

Table 1-2. RCRA, UST, and CERCLA Processes for Remediation of Contaminated Sites

RCRA	UST	CERCLA
RCRA Facility Assessment (RFA)	Site Investigation	Preliminary Assessment/ Site Inspection (PA/SI)
RCRA Facility Investigation (RFI)		Remedial Investigation (RI)
Corrective Measures Study (CMS)	Corrective Action Plan (CAP)	Feasibility Study (FS)
Draft Permit Modification		Proposed Plan (PP)
RCRA Permit		Record of Decision (ROD)
Corrective Measures Implementation	Remediation Work Plan	Remedial Design/ Remedial Action (RD/RA)

Eligibility to Add Petroleum, Oil or Lubricants (POL) ER,N UST/AST Documents to NIRIS

Add only E,RN and E,RN II funded POL program documents to NIRIS. Documents must be identified as part of ER,N II or as a site which will definitely become part of ER,N II

When an UST/AST is moved from one Program to another, move the document to reflect the change. A document cannot be part of multiple cleanup programs.

If the UST/AST document is associated with a Restoration cleanup, add the documents to the installation AR File because it was most likely a factor in the decision making process for the Restoration site. Check with the Project Manager if there is doubt

GUIDELINES:

ADD

- If UST/AST documents in NIRIS are identified as ER,N funded, re-designate, via EDMS, as POL

- If the UST/AST documents are identified as E,RN funded, add documents, via EDMS, to NIRIS

- If an UST/AST site was created and initially funded by E,RN then subsequently moved to another Environmental Program, treat documents associated with the site as E,RN documents and add, via EDMS, to NIRIS

- If an UST/AST site was created and funded by the Compliance Program but it can be confirmed that the site was moved into the E,RN (ER,N II) Program, treat

documents associated with the site as E,RN documents and add, via EDMS, to NIRIS

- o This Direction applies ONLY to those sites that there is a high level of confidence that it will be moved to ER,N II

DO NOT ADD

▪ Do not add all UST/AST documents to NIRIS. Check and confirm that it should be added

▪ If an UST/AST was created and funded by Compliance and is currently in Compliance, it stays in Compliance

▪ Do not add UST/AST sites for which a determination has not been regarding transition to ER,N II

Frequently Asked Questions about POL documents

1) **What should I do when I find an historic POL document already in NIRIS that is not identified as POL?**

   - Change documents identified as POL in EDMS. Use the File Type – **POL** which is found in the EDMS File Type pull down menu

   - Document changes, updates, etc., in the EDMS Comments field.

2) **Do I need to change identifying information on the PDF?**

   - Yes, change the information on the .PDF version of the document title or cover page in NIRIS

3) **What Standard Subject Identification Code (SSIC) Number should be used for POL documents?**

   - Use SSIC 5000-33